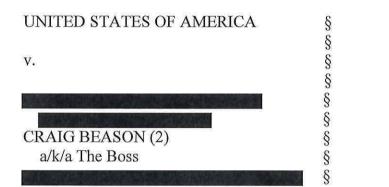
## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION





# INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

## **COUNT ONE**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute Methamphetamine)

SEALED

Case No. 4:20CR 48

Judge lood ar

That from sometime on or about June 28, 2019, and continuously thereafter up to and including on or about July 3, 2019, in the Eastern District of Texas and elsewhere,

knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute a substance or mixture containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

#### **COUNT TWO**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute Heroin)

That from sometime on or about June 28, 2019, and continuously thereafter up to and including on or about July 3, 2019, in the Eastern District of Texas and elsewhere,

Craig Beason, and did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute a substance or mixture containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

#### **COUNT THREE**

Violation: 18 U.S.C. § 2 and 922(g)(1) (Aiding and Abetting and Possession of a Firearm by a Prohibited Person)

On or about June 29, 2019, in the Eastern District of Texas, defendants, and and knowing that Joshua Keith Washburn had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, Felon in Possession of a Firearm in Case No. 4:12CR30 in the Western District of Missouri, aided and abetted by each other, did knowingly possess in and affecting interstate and foreign commerce the following firearms: a Titan Tiger 38 special, a 22 Sig Sauer pistol, and a Sig Sauer 9 MM pistol.

In violation of 18 U.S.C. § 922(g)(1).

Indictment Page 2

#### **COUNT FOUR**

Violation: 18 U.S.C. § 2 and 924(c) (Aiding and Abetting and Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

In violation of 18 U.S.C. § 924(c).

## **COUNT FIVE**

Violation: 21 U.S.C. § 843(b) (Use of a Communication Facility to Cause or Facilitate a Controlled Substance Offense)

On or about July 3, 2019, in the Eastern District of Texas,
and did knowingly and intentionally use a communication
facility, to wit, a telephone located in the Eastern District of Texas, in facilitating the
commission of any act or acts constituting a felony under 21 U.S.C. § 846, that is
Conspiracy to Possess with Intent to Manufacture and Distribute Methamphetamine, as
described in Count One of the Indictment.

In violation of 21 U.S.C. § 843(b).

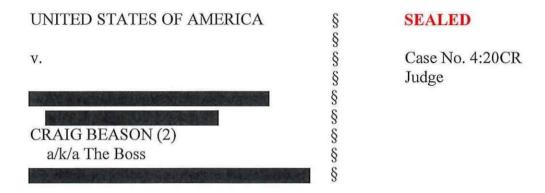
# NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses charged in this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

- a. a Titan Tiger 38 special;
- b. a 22 Sig Sauer pistol;
- c. a Sig Sauer 9 MM pistol; and
- d. any ammunition related to the case.

	A TRUE BILL
	GRAND JURY FOREPERSON
JOSEPH D. BROWN UNITED STATES ATTORNEY	
ANAND VARADARAJAN G.R. JACKSON	Date

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION



### NOTICE OF PENALTY

#### Counts One and Two

Violation:

21 U.S.C. § 846

Penalty:

Imprisonment for a term of not more than 20 years, a fine not to exceed \$1 million, or both; and a term of supervised release of at least three years.

If it is shown that the defendant committed such violation after a prior conviction for a felony drug offense has become final, not more than 30 years, a fine not to exceed \$2 million, or both; a term of supervised release of at least 6 years.

Special

Assessment: \$100.00

**Count Three** 

Violation:

18 U.S.C. § 2 and 922(g)(1)

Penalty:

Imprisonment for a term of not more than ten years, a fine not to exceed \$250,000, or both; and a term of supervised release of not more than three years.

If it is shown the defendant has three previous convictions by any court for a violent felony or a serious drug offense, or both, committed on occasions different from one another - Imprisonment of 15 years to life, a fine not to exceed \$250,000.00, or both; a term of supervised release of at least 2 years but not more than 5 years.

Notice of Penalty

Page 1

Special

Assessment: \$100.00

**Count Four** 

Violation: 18 U.S.C. § 2 and 924(c)

Penalty: Imprisonment for a term not less than five years, which must be served

consecutively to any other term of imprisonment; a fine not to exceed \$250,000, or both; and a term of supervised release of not more than three

years.

**Special** 

Assessment: \$100.00

**Count Five** 

<u>Violation</u>: 21 U.S.C. § 843(b)

Penalty: Imprisonment for a term of not more than 4 years, a fine not to exceed

\$250,000, or both; and a term of supervised release of up to one year.

**Special** 

Assessment: \$100.00